UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

May 7, 1997

Mr. Philip Otis
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: Draft-Final Remedial Investigation Report (RI) for Site 7, Calf Pasture Point, and the Response to Comment Document, Former Naval Construction Battalion Center, Davisville, RI

Dear Mr. Otis:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency (EPA) has reviewed the above referenced documents. Our comments are enclosed in two separate enclosures. The first are our responses to the RTC document and the second are our comments on the redlined draft final document.

The Navy has revised its Conceptual Model of site conditions, which now appears to be more representative of site conditions. The Conceptual Model indicates shallow contaminated groundwater discharge to the surface water of Allen Harbor. The exact locations of this discharge have not been documented with certainty which raises considerable concern regarding long term monitoring implications. Many issues still remain with respect to a complete understanding of the hydrogeologic conditions within the site. The need for continued investigation within the site should be evaluated given the complexity of the site with respect to salinity issues and varying geologic parameters with any particular unit, and the history of the site being used as a dredge spoil disposal area. The evaluation should consider how specific investigation outcomes would impact the impact the overall remedy and the likelihood of whether any additional investigation would minimize the uncertainty to this highly complex system.

EPA believes that the adequacy of monitoring points along the perimeter of the site is more critical than continued investigation within the center of the site because the perimeter/lowlands are the most likely location of contaminant exposure to the expected recreational and ecological receptors. Special emphasis should be placed on identifying, finding, and monitoring any potential discharge points along the western and southern shoreline perimeter of the site. EPA's primary goal is to confirm and monitor contamination discharge to the sediment/surface water regardless of which pathway within the center of the site the contamination migrates. Therefore, focused investigation and extensive monitoring along the perimeter of the site during the remedial design phase should be a priority so that over time the impacts from the site on human health and ecological systems can be monitored.

EPA expects the Navy to respond in writing to these comments. EPA has set up a meeting to discuss the Navy responses to these comments on Friday, May 16, 1997 at our offices at 90 Canal Street in Boston.

If you have any questions concerning this letter, please contact me at (617) 573-5736.

Sincerely,

Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

Enclosures

cc: Richard Gottlieb, RIDEM
Walter Davis, NCBC
Bill Brandon, EPA
Jayne Michaud, EPA
Forest Lyford, USGS
Tim Prior, USF&WS
Marilyn Cohen, ToNK
Howard Cohen, RIEDC
Marjory Myers, Narragansett Indian Tribe
Bryan Wolfenden, RI RC&D
George Horvat, Dynamac
Jim Shultz, EA

EPA Comments on the Redlined Draft Final RI for Site 7-Enclosure 2

Executive Summary, page 8, shaded part of text. This statement is not clear. Please clarify what the writer's main point is in this section.

Executive Summary, page 9. The last sentence of the first paragraph suggests that interpretation of flow pathways in several areas were determined by numerical modeling. Only one profile model is presented in Appendix J1, and its location is not known.

Chapter 4, page 10. The discussion of the borehole logging results under MW07-10D states that deep ground water in the till is fresh. The log indicates an increase in electrical conductivity, suggesting an increase in salinity. The well screen is above the high salinity portion of the groundwater, therefore the deeper water is actually more salty than the groundwater from the screened area shows.

Chapter 4, page 10. The discussion under MW07-21D references wells MW07-19S/D/R. It appears that reference should be to wells MW07-21S/D/R.

Chapter 4, page 11. Discussions of logging results for two wells made a point of the fact that zone that had the freshest water and was potentially contaminated was being monitored in the well nest. In the discussion of MW07-24D a statement could be included that the zone with the freshest water was not being monitored.

Chapter 4, page 11. Delete the statement "of the USGS" under the first bullet of conclusions. (See also the first comment on Appendix J)

Figure 4-4 to 4-10. We suggest including a sample-collection date on these sections.

Appendix J1. The last page was prepared by the USGS for internal use to stimulate discussions of the data. We request that this page be removed. If Navy concurs with the observations presented in the statement, they are welcome to include them in the report, but reference to USGS must be removed since the document in question was for internal use only.

Appendix J1. Figure 1 is useful for formulating a conceptual model of the site. However, it is not clear what part of the study area is represented by this section and what properties were assigned to the various geologic units. Also, we suggest that consideration be given to running the model for a simulation period longer than one month to approach a steady state condition. There is confusion on the length of the simulation period; figure 1 states one month and table 3 states 1 year. The lengths of the flow lines on Figure 1 suggest that at least one year was simulated. Finally, it is not clear from the information presented if bedrock was part of the simulation.